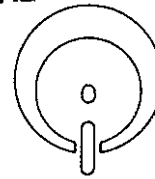


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FCC Mail Room



IOWA PUBLIC RADIO.

Donald Wirth
WOI Radio Group
2022 Communications Building
Iowa State University
Ames, Iowa 50011

April 24, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: MM Docket No. 04-233

Dear Ms. Dortch:

As the manager of public stations WOI-AM/FM, KTPR-FM, KWOI-FM and KOWI-FM (collectively referred to as the WOI Radio Group), I'd like to offer comments on the matter of broadcast localism (MM Docket No. 04-233). These stations are licensed to Iowa State University and we are member stations of Iowa Public Radio.

I applaud the Commission's desire to support broadcast localism and diversity, increasing the amount and nature of broadcast programming that is targeted to needs and interests of the communities we serve. This is a worthy goal and one that the WOI Radio Group takes very seriously. I write to the Commission now, however, to ask you to refrain from imposing restrictions and requirements on

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non-commercial radio stations that would create financial and resource hardships, thereby limiting our ability to nimbly serve our local audience's needs.

Public radio stations in Iowa have a long and proud history of local community presence and commitment to locally-relevant programming. This has been critical to Iowa Public Radio's success. Iowa Public Radio stations have a weekly audience of more than 220,000 people and we have more than 20,000 contributing supporters over the past three years.

The WOI Radio Group stations and the other stations of Iowa Public Radio provide extensive local news coverage and original talk programming that informs Iowans of issues affecting their communities and their state. We invite members of the audience into the discussion with two daily talk programs, *The Exchange* and *Talk@12*. Our large reporting staff covers issues affecting communities throughout Iowa as well as news from the Statehouse in Des Moines. In a major effort to inform the voting public in this election cycle, we have brought the presidential campaigns of both parties – which truly get underway here in Iowa – to our listeners, following the candidates around the state to explain how their messages are shaped and communicated to voters.

Original cultural and musical programming is another way in which the WOI Radio Group stations and our fellow stations of Iowa Public Radio serve local community needs and interests. We work with local arts and cultural institutions

to highlight their activities and presentations through interviews and recording performances. This interaction has resulted in recognition of the stations and our producers by local organizations for contributing to the quality of life in the communities. Our weekly program "University Concerts" presents performances of musical and choral groups throughout Iowa, a venue that is not available anywhere else on radio in Iowa. We have produced a monthly program before a studio audience that presented local musical groups.

Public radio is local, not only because much of our programming has a local focus but because we draw upon Iowa listeners and local business underwriters for direct financial support. We also partner with area organizations to promote a better quality of life in Iowa. The WOI Radio Group produces and airs concerts by the Des Moines Symphony Orchestra and we collaborate with our fellow stations of Iowa Public Radio (KSUI and KHKE) to present the concert programming they produce with two other Iowa orchestras.

These public stations are definitely "on the ground" as community participants in Iowa. We have paid staff in multiple locations as well as regional advisory boards established to give us feedback on our work. We are governed by the Iowa State Board of Regents and the Iowa Public Radio Board of Directors which meet throughout the year and whose meetings are open to the public. Iowa Public Radio has undertaken a number of additional efforts to engage with our listeners. We surveyed over 2,000 Iowans in the 2006/2007 Iowa Listening

Project Phase I. We expect to begin Phase II of the Listening Project in fall 2008. We have spent a great deal of effort building the Iowa Public Radio website (www.iowapublicradio.org) so that it can not only provide current information on programming, membership, station history and the like, but also podcasts of Iowa Public Radio programs, news reports and feature stories as well as a very special "contact" form that links listeners with management and staff of the station. Listeners contact us with comments and questions and each person receives an individual response from IPR staff. We have established and promote WATS lines for listener contacts. We strongly believe in transparency to the public and post our financial and employment reports on our website.

Another area of concern for my station and other public stations is the proposed regulation prohibiting automated broadcast transmissions. The WOI Radio Group has invested heavily in state-of-the-art equipment and automation systems which can carry our Iowa-produced programming to most corners of Iowa and beyond through web streaming. We believe the people of Iowa are well-served by these investments and fear that a requirement to staff each control room 24 hours a day would prevent us from hiring the reporters, producers and other staff that tangibly improve local program offerings.

The requirement to provide a main studio in the city of license is also cost-prohibitive. Main studio waivers have enabled rural public radio stations to serve large geographic areas in this country that could not possibly support stand-alone stations. Iowa Public Radio would find it very difficult to provide its current level of

service to communities in rural areas with low population numbers if we had to provide a main, staffed studio in each station location. Stations KTPR (Fort Dodge), KWOI (Carroll) and KOWI (Lamoni) were only brought on the air as part of the WOI Radio Group at the request of local residents with the understanding that we would be presenting the programming of the WOI stations and could not staff the stations. KTPR was about to go dark because the previous owner could no longer support the operation of the station. KOWI was claimed from bankruptcy. We purchased the license in the commercial band and converted it to a noncommercial educational license. We obtained the license and built KWOI only at the request of the residents of Carroll. We could not have responded to the listeners' requests in any of these areas if we were required to meet these proposed staffing requirements.

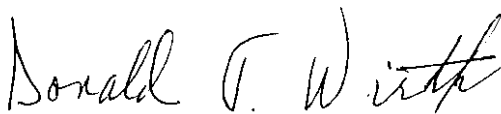
One further concern we have is the potential for new regulatory requirements such as mandatory minimum program origination obligations, enhanced disclosure requirements, and new license renewal processing guidelines which would increase our administrative costs at a time when our resources are already stretched thin. We are a local, public, non-profit educational organization that depends on its community for continued existence and we believe that we are fulfilling our public service mission by honoring the regulations already in place.

In conclusion, the stations of Iowa Public Radio recognize that relevance to our local area is critical to our survival as publicly-supported stations. We feel that

the imposition of any further restrictions or regulations on public radio organizations would drain resources and endanger the fine balance that now exists between an active local programming effort and the global programming we offer the curious citizens of Iowa. This intelligently-crafted balance has been the hallmark of our stations since their inception and we are hopeful that the Commission will recognize that public radio stations can serve the needs of their listeners best when freed from new and potentially onerous federal regulations and allowed to respond with flexibility to the needs of their own, local communities.

I thank you for the opportunity to comment on the proposed rulemaking.

Sincerely,

A handwritten signature in cursive script that reads "Donald T. Wirth".

Donald Wirth
Station Manager, WOI Radio Group
Director of Finance and Administration, Iowa Public Radio

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